

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Elazar Rosenshine

20 Hawthorne Lane
Great Neck, NY 11023

Plaintiff,

-against-

1) A. Meshi Cosmetics Industries Ltd.

8 Shimon Habursakai Street
Industrial Park Bat Yam 59598
Israel

2) A to Z Import Inc.

305 E 88th Street
Brooklyn, NY 11236

3) Eyal Noach

2445 E 65th Street
Brooklyn, NY 11234

Defendants.

MOTION FOR DEFAULT JUDGMENT

Case No.

18CV3572(LDH)(LB)

Plaintiff hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in favor of Plaintiff and against Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach on the grounds that said Defendants failed to answer or otherwise defend against the complaint.

Dated: 10/19/2018

By: 

Elazar Rosenshine

TO: 1) A. Meshi Cosmetics Industries Ltd.
8 Shimon Habursakai Street
Industrial Park Bat Yam 59598
Israel
2) A to Z Import Inc.
305 E 88th Street
Brooklyn, NY 11236
3) Eyal Noach
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Defendants.

**AFFIRMATION IN SUPPORT OF
MOTION FOR DEFAULT
JUDGMENT**

Case No.

18CV3572(LDH)(LB)

Elazar Rosenshine hereby declares as follows:

1. I am the Plaintiff in this action.
2. This action was commenced pursuant to Trademark Counterfeiting.
3. The time for Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach to answer or otherwise move with respect to the complaint herein has expired.
4. Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach have not answered or otherwise moved with respect to the complaint, and the time for Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach to answer or otherwise move has not been extended.

5. That Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach are not infants or incompetent. Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach are not presently in the military service of the United States as appears from facts in this litigation.
6. Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach are indebted to Plaintiff, Elazar Rosenshine, in the following manner:

Defendants forged Plaintiff's Star Gel® brand, a federally registered trademark, and sell counterfeit versions of the Star Gel® products to Plaintiff's customers. Plaintiff requests the Court to award him all reliefs sought in the complaint.

WHEREFORE, Plaintiff Elazar Rosenshine requests that a default judgment be entered in favor of Plaintiff Elazar Rosenshine and against Defendants A. Meshi Cosmetics Industries Ltd., A to Z Import Inc., and Eyal Noach.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to Plaintiff, and that no part thereof has been paid, and that the disbursements sought to be taxed have been made in this action or will necessarily be made or included in this action.

Dated: 10/19/2018

By: 
Elazar Rosenshine